

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

**THE PLAINTIFFS' STEERING COMMITTEE'S
MOTION FOR PROTECTIVE ORDER REGARDING
SUBPOENA DIRECTED AT NORTHWELL HEALTH, INC.**

PLEASE TAKE NOTICE that, at 9:00 a.m. on February 5, 2024, or at such other time as set by the Court, Plaintiffs, by and through the Plaintiffs' Steering Committee (PSC), will Move for Protective Order Regarding Subpoena Directed at Northwell Health, Inc.

As fully discussed in Plaintiffs' Memorandum of Law in Support of this Motion, the Court should issue a protective order relieving non-party Northwell Health's, Inc. obligation to comply with the subpoena served by Johnson & Johnson because it seeks irrelevant information implicating the protected health information of non-parties.

Plaintiffs respectfully request that the Court grant the Motion for Protective Order Regarding Subpoena Directed at Northwell Health, Inc.

A proposed order is attached for the Court's consideration.

Dated: January 12, 2024

Respectfully submitted,

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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ Michelle A. Parfitt
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